

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 9:23-cv-80616-RLR

Adrian Boot,

Plaintiff,

v.

Consequence Sound LLC,

Defendant.

**DECLARATION OF CRAIG B. SANDERS IN SUPPORT OF
PLAINTIFF'S MOTION FOR ATTORNEYS' FEES**

CRAIG B. SANDERS, ESQ., pursuant to 28 U.S.C. § 1746, hereby declares under penalty of perjury, as follows:

1. I am an attorney duly admitted to practice law before this Court and am the managing member of Sanders Law Group, attorneys for Plaintiff Adrian Boot ("Boot" or "Plaintiff") in this action. As such, I have personal knowledge of all facts and circumstances upon which this Declaration is based, except for those facts and circumstances set forth upon information and belief and, as to those facts, I believe them to be true, based upon conversations with my client, review of my file, and my personal involvement in this case.

2. I submit this declaration in support of Plaintiff's Motion for Attorneys' Fees against Defendant Consequence Sound LLC ("Defendant" or "Consequence"). In support of the portion of the motion which asks the Court to fix an award of fees and costs, I submit the following:

3. By way of background, I received my Juris Doctor (J.D.) from the University of Pennsylvania Law School in 1993 and am a founding partner in the law firms of Sanders Law,

PLLC, and Sanders Law Group. I was admitted to practice law in Florida in 1993 and New York in 1994. In addition to New York and Florida, I am currently admitted to practice law in the states of California, Utah, Colorado, Maryland, Washington and New Jersey. In addition to the above-listed state admissions, I am admitted to practice law in the Federal Courts of Arkansas, California, Colorado, Connecticut, District of Columbia, Florida, Illinois, Indiana, Maryland, Michigan, Missouri, Nebraska, New York, New Jersey, Ohio, Oklahoma, Tennessee, Texas, Utah, Washington and Wisconsin. I am also admitted to the Second, Third, Fifth, Ninth, and Tenth Circuit Courts of Appeals and have argued appeals in each of these Circuits. I am also admitted to practice before the United States Supreme Court. I am in good standing in the above referenced Courts and have never been disciplined by any bar. During the course of my thirty (30) year professional career, I have focused on Federal Litigation, primarily involving civil litigation matters and have personally filed and litigated hundreds of copyright cases.

4. My hourly rate for the prosecution of copyright infringement matters is \$700/hr., which is well within the range of hourly billing for similarly experienced attorneys according to the Report of the Economic Survey (2021) for the American Intellectual Property Law Association (*attached as Exhibit 1 hereto*).

5. My billing rate was recently cited with approval and confirmed in the award entered in in the case *James Messerschmidt v. Gazeta Brazilian News Corporation*, Case No. 0:22-cv-61614-AHS in this judicial District.

6. As part of my responsibilities at Sanders Law Group, I maintain the Firm's billing records, and I supervise the Firm's billing procedures and policies, both for our paying clients, as well as for our work in fee-shifting cases.

7. Concerning the billing records attached to this Declaration, I have reviewed the billing records of the Firm to identify time entries that may be duplicative (or deemed excessive) and subtracted these amounts or events. It is my belief that the entries on the billing records (*attached hereto as Exhibit 2*) are reasonable for the successful prosecution of this case.

8. In addition to the time entries, Plaintiff incurred and seeks reimbursement for costs set forth in the accompanying Bill of Costs submitted herewith, in the amount of \$477.00, which includes a \$402.00 filing fee, and a \$75.00 service of process fee from Gotcha Legal Services, Inc. (A copy of the Invoice from Gotcha Legal Services, Inc. is attached hereto as *Exhibit 3*).

9. For the foregoing reasons, as well as those set forth in the accompanying Memorandum of Law and all the papers heretofore submitted, I respectfully request that the Court award attorneys' fees and costs as detailed in the attached billing records.

DATED: July 25, 2023

/s Craig B. Sanders
Craig B. Sanders, Esq.

